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14
15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 ROBERT HUNTER BIDEN,

18 Plaintiff,

v.

19 PATRICK M. BYRNE,

20 Defendant.

21 Case No. 2:23-cv-09430-SVW-PD

22 **STIPULATION TO EXTEND TIME
23 TO RESPOND TO INITIAL
24 COMPLAINT BY NOT MORE THAN
25 30 DAYS (L.R. 8-3)**

26 **Complaint Served by Waiver of Service:**
27 November 16, 2023
Current Response Date:
28 February 6, 2024
New Response Date:
February 13, 2024

1 Plaintiff Robert Hunter Biden (“Plaintiff”) and Defendant Patrick M. Byrne
2 (“Defendant,” and collectively with Plaintiff, the “Parties”), through their respective
3 attorneys of record herein and without waiving any rights, claims, or defenses they
4 have in this action, enter into this stipulation pursuant to Civil Local Rule 8-3, with
5 reference to the following circumstances:

6 WHEREAS, Plaintiff filed his complaint on November 8, 2023 [Dkt. No. 1].

7 WHEREAS, Defendant’s attorney executed a Waiver of Service on November
8 16, 2023, which Plaintiff filed on November 21, 2023 [Dkt. No. 12].

9 WHEREAS, Defendant’s answer was originally due 60 days later, on January
10 16, 2024.

11 WHEREAS, Local Rule 8-3 provides in pertinent part that “A stipulation
12 extending the time to respond to the initial complaint shall be filed with the Clerk. If
13 the stipulation, together with any prior stipulations, does not extend the time for
14 more than a cumulative total of thirty (30) days from the date the response initially
15 would have been due, the stipulation need not be approved by the judge.”

16 WHEREAS, Plaintiff and Defendant previously met and conferred and agreed
17 to extend the deadline on which Defendant must file and serve a responsive pleading
18 in this action for twenty-one days, from January 16, 2024, to February 6, 2024.

19 WHEREAS, in accord with their agreement, the parties previously submitted
20 a Stipulation To Extend Time To Respond To Initial Complaint By Not More Than
21 30 Days (L.R. 8-3) [Dkt. No. 20.]

22 WHEREAS, Defendant requested, and Plaintiff agreed, to a brief further
23 continuance to allow time for Defendant’s lead counsel to file pro hac vice
24 applications.

25 WHEREAS, the parties agreed to extend the deadline by which Defendant
26 must file and serve a responsive pleading for seven additional days, from February
27 6, 2024, to February 13, 2024.

WHEREAS, this extension does not extend Defendant's deadline to respond to the complaint to a date more than thirty days from the date the response initially would have been due.

NOW, THEREFORE, THE PARTIES HEREBY STIPULATE:

1. Pursuant to Civil Local Rule 8-3, Defendant's deadline to file and serve a response to Plaintiff's complaint shall be February 13, 2024.

CYPRESS LLP

DATED: February 6, 2024

By: /s/ Nabil L. Abu-Assal
Nabil L. Abu-Assal
Douglas P. Roy
Daniel A. Corren

Attorneys for Defendant Patrick M. Byrne

WINSTON AND STSRAWN LLP

DATED: February 6, 2024

By: /s/ Paul Benedict Salvaty
Paul Benedict Salvaty
Abbe David Lowell

Attorneys for Plaintiff Robert Hunter Biden

ATTESTATION

I attest that all the signatories listed above concur in this filing's contents and have authorized the filing of this document.

DATED: February 6, 2024

By: /s/ Nabil L. Abu-Assal
Nabil L. Abu-Assal